

Mr Craig Swift-McNair
General Manager
Woollahra Municipal Council
PO Box 61
DOUBLE BAY NSW 2028

Dear Mr Swift-McNair

Planning proposal PP_2020_WOOLL_007_00 to amend Woollahra Local Environmental Plan 2014

I write in response to Council's request for further advice on pathways to progress the planning proposal to increase the minimum lot size for attached dual occupancies from 460m² to 800m². This matter was discussed at the quarterly meeting between Council's planning officers and the Department's staff on 18 September 2020.

As outlined in our letter dated 10 August 2020 (enclosed), the Department acknowledges Council's intent to protect Woollahra's natural environment, residential amenity and desired future character of the R2 Low Density Residential Zone. However, the planning proposal would reduce the number of lots eligible for attached dual occupancy development via both the development application (DA) and complying development certificate (CDC) pathways, thereby reducing the capacity of housing supply.

In order to determine the impact on housing supply and diversity, and how the proposal fits in with Council's overall strategy to meet future housing needs in the LGA, the Department considers that a Local Housing Strategy (LHS) is required to guide the consideration of the proposal. Without a completed LHS, it would appear to be premature to progress the proposal to increase the minimum lot size requirement, as the potential effects on housing needs and delivery could not be ascertained.

Additionally, the key issues raised in the previous letter will need to be addressed:

- The inconsistency with Ministerial Direction 3.1 Residential Zone, due to the proposal's impact on housing growth and choice. The proposal in its current form has not provided adequate analysis to demonstrate that a variety of housing types will be provided for existing and future housing needs.
- Further analysis, including design modelling, is required to determine the most appropriate minimum lot size for attached dual occupancies, having regard to the objective of the proposal to protect the environment, residential amenity and local character.

- The planning proposal also requires administrative changes to rectify minor errors and omissions (these are detailed in the attachment to the Department's letter of 10 August).

I encourage Council to continue its work on the Local Housing Strategy and to address the issues raised above. The planning proposal is currently placed on hold, pending resolution of the above matters.

Should you wish to discuss this matter further, please contact Mr Simon Ip, Manager, Place and Infrastructure, at the Department of Planning, Industry and Environment on 8289 6714.

Yours sincerely



6 October 2020
Eva Stanbury
A/Director, Eastern and South Districts
Greater Sydney, Place and Infrastructure

Encl. Department's letter to Council dated 10 August 2020